

Applicant: Coach Wei, *et al.*
U.S.S.N.: 10/017,183
Filing Date: 12/07/2001
EMC Docket No.: EMC-06-235(PRO)ORD1

REMARKS

Applicants thank the Examiner for the continued careful consideration of the subject application. The Office Action mailed May 28, 2008 has been carefully considered. In this Office Action, Claims 1-18 and 22-25 were rejected and remain pending. Claims 1-18 and 22-25 were rejected under 35 USC 103(a). In light of the arguments presented herein, Applicants respectfully request reconsideration, removal of the rejections, and that the claims be placed in condition for allowance.

The Office Action rejected Claims 1-18 and 22-25 under 35 USC 103(a) as being unpatentable over Bahrs, (U.S. Pat. No. 6,901,554) hereinafter Bahrs, in view of "*What are Enterprise JavaBeans components?: Part 1: The history and goals of EJB architecture*," hereinafter Norby, and further in view of Diedrich (U.S. 6,064,382) herein after Diedrich. Applicants assert that the cited art, in isolation or in combination does not teach, suggest, or disclose the claimed invention and may not be used as a proper 35 USC 103 rejection. Claims 1, 22, and 23 are the only independent claim all other claims depend on Claims 1, 22, and 23.

In *Teleflex v. KSR*, the Supreme Court stated that a proper 35 USC 103 rejection requires the following steps be performed: (1) Determining the scope and content of the prior art; (2) Ascertaining the differences between the claimed invention and the prior art; and (3) Resolving the level of ordinary skill in the pertinent art. *Teleflex Inc. v. KSR Int'l Co.* 127 S.Ct. 1727, 1741, 82 USPQ.2d 1385, 1396 (2007). This three part test has also been reemphasized and promulgated in the Federal Register. *Federal Register*, Vol. 72, No. 195.

Applicant: Coach Wei, *et al.*
U.S.S.N.: 10/017,183
Filing Date: 12/07/2001
EMC Docket No.: EMC-06-235(PRO)ORD1

Applying the first step of KSR test to determine the scope and the content of the cited art, Applicants first address the scope and content of Bahrs. Bahrs states he provides a “method and apparatus in a data processing system for displaying a component or container.” Abstract. More particularly Bahrs states he “provides an architectural pattern for creating applications for a data processing system.” “Processes for presenting the plurality of components and receiving user input are handled by a first set of graphical objects, wherein in response to selected user input, a first event is generated.” (Col. 2, 55-56).

Bahrs describes that an “[a]rchitectural pattern includes a View Controller which provides a display of a component, container or bean on a data processing system . . . View controller basically provides a reusable GUI element containing graphical components such as text fields . . . to be displayed for viewing and interact by a user. However, Bahrs also states that “The key to successful implementation . . . is the proper division of the application into logical subsystems.” Where “[t]his division should be driven by the analysis of the application’s domain.” “For example, using an object oriented analysis of the application’s domain, set of use cases can be developed.” Applicants respectfully assert that Bahrs focuses on providing different ViewControllers based on application domain specific information.

With respect to the second step of KSR and Bahrs, Applicants respectfully assert that Bahrs does not teach, at least, “a plurality of client devices, at least two of the client devices differing in type and display capabilities,” “receiving a request from a client and determining a type of the client,” “in response to the type of the client, replacing the GUI API with a re-implemented, network aware GUI API comprising a User Interface (UI) record,” “the UI record comprising pre-determined format based messages describe the Graphical User Interface,” and

Applicant: Coach Wei, *et al.*
U.S.S.N.: 10/017,183
Filing Date: 12/07/2001
EMC Docket No.: EMC-06-235(PRO)ORD1

“processing the messages in the UI record and rendering a user interface by a client-side program operating at the client, which delivers a user experience for that device according to the display capability of the client.” Applicants respectfully assert that the Examiner agrees with these assertions as they are stated on Page 6 of the current Office Action.

Applying the first step of KSR test to determine the scope and the content of the cited art, Applicants now address the scope and content of Norby. Norby states he provides “an overview of Enterprise JavaBeans (EJB technology enabling readers to gain a quick understanding of essential concepts).” Page 1. The Office Action states that Norby discloses that “an EJB component can be developed once and then deployed on multiple platforms without recompilation or source code modification.” Applicants believe that the Office Action cited Norby to disclose that an application can be developed once and deployed multiple times. Applying the second step of KSR to Norby, Applicants respectfully assert that Norby does not cure the deficiencies of Bahrs as outlined above, nor does the Office Action assert this.

Applying the first step of KSR test to determine the scope and the content of the cited art, Applicants now address the scope and content of Diedrich. Diedrich states he provides “a graphical user interface for existing host-based (i.e., green screen) applications by defining some object oriented classes that reside on the client workstation, and by substituting function calls for display data in the green screen application with function calls that interface with the objected oriented GUI defined by the classes.” Diedrich functions whereby an “OO GUI may be used as a front-end to host-based applications. Classes are defined that implement the OO GUI. Host-based application is modified so that all its display I/O function calls are replaced with function

Applicant: Coach Wei, *et al.*
U.S.S.N.: 10/017,183
Filing Date: 12/07/2001
EMC Docket No.: EMC-06-235(PRO)ORD1

calls to GUI portions of OO GUI to provide the graphical user interface for an existing host-based application.” Column 8 lines 7-14.

Diedrich’s classes include a “HostScreenLayout that manages the layout of the screens for the client. “HostScreenLayout is a subclass of the LayoutManager class in the Java Toolkit, and is representative of concrete subclasses that are defined to represent particular host screen layouts. For example, one particular concrete implementation of HostScreenLayout is 5250ScreenLayout, which would define the layout of the host screen for an IBM terminal.” Column 9 lines 54-61. Accordingly, Diedrich has “a tool to convert existing display files into a set of classes that define screen attributes, . . . [which may] include[s] the definition of one or more formats.”

However, “[e]ach of these classes correspond to a screen format which may define a whole screen or portion of a screen . . . display files are converted to a set of classes representing screens in the graphical user interface . . . Once the classes are defined they may be modified to provide enhanced GUI capabilities.” Column 8 lines 50-Column 9 line 10. Hence, Applicants assert that Diedrich has a “concrete” “HostScreenLayout” for each “screen format” on which it displays.” Applicants assert that Diedrich has a particular instance of a class for each “terminal” on which Dierich is displayed. That is, Diedrich is implemented specifically for each “terminal” upon which the “Green Screen” application is to be run.

With respect the second step of KSR, the differences between Diedrich and the current invention, Applicants respectfully assert that Diedrich does not disclose, at least, “the UI record comprising pre-determined format based messages describe the Graphical User Interface,” and “processing the messages in the UI record and rendering a user interface by a client-side program

Applicant: Coach Wei, *et al.*
U.S.S.N.: 10/017,183
Filing Date: 12/07/2001
EMC Docket No.: EMC-06-235(PRO)ORD1

operating at the client, which delivers a user experience for that device according to the display capability of the client.” Rather, as noted above, Diedrich uses no such messages; instead Diedrich uses a set of predefined concrete java classes. In Diedrich, “I/O function calls are replaced with function calls to GUI APIs . . . GUI APIs interact with the appropriate portion of OO GUI to provide the graphical user interface for an existing host-based application.”

In Diedrich, the “system configuration of Fig. 4 and the resulting process flows of Fig. 14 assume that an existing green screen application has already been converted . . . Host process manager then runs the host-based application and listens for a connection.” “JAVAApp begins by creating a Host Panel by invoking the constructor method and passing the name of the host and the port identifier as parameters.” Column 10 lines 62. Applicants respectfully assert Diedrich functions not by using “comprising pre-determined format based messages describe the Graphical User Interface” but instead implements java object methods such as “loadParams() . . . getInputField() . . . LoadParams() . . . GetInputField () . . .” Applicants assert Diedrich uses a “concrete class” for each client device on which it can run, in turn, it then directly links function or method calls of the Green application to the concrete class or classes. Accordingly, Diedrich has no need for and does not use “pre-determined format based messages describe the Graphical User Interface” as claimed in the current invention. Applicants also assert that such a “pre-determined format based messages” are not necessary and would not add to Diedrich.

Applicants therefore assert that none of the cited references, together or in isolation, teach the claimed invention. Applicants further assert that one skilled in the relevant computer arts would not bridge the gap to arrive at the current invention. Therefore, Applicants respectfully assert that these references, in combination or in isolation, fail to satisfy the 35 USC 103 test as

Applicant: Coach Wei, *et al.*
U.S.S.N.: 10/017,183
Filing Date: 12/07/2001
EMC Docket No.: EMC-06-235(PRO)ORD1

promulgated by the Supreme Court in KSR. As a result, Applicants assert that this 35 USC 103 rejection is improper and respectfully request it be removed and independent Claims 1, 22, and 23 be placed in condition for allowance. As Claims 2-18, 24, and 25 depend from Claims 1, 22, and 23 Applicants assert that they should be allowable for at least the same reasons as the independent claims. Applicants therefore request that the rejection of these claims also be removed and the defendant claims also be placed in condition for allowance.

Conclusion

In view of the foregoing, the Applicants believe that the application is in condition for allowance and respectfully request favorable reconsideration.

In the event the Examiner deems personal contact desirable in the disposition of this case, the Examiner is invited to call the undersigned agent at (508) 293-7450.

Please charge all fees occasioned by this submission to Deposit Account No. 05-0889.

Respectfully submitted,

Dated: August 27, 2008

/Joseph D'Angelo/
Joseph D'Angelo (Reg. No. 56,800)
Agent for Applicants
EMC Corporation
Office of General Counsel
176 South Street
Hopkinton, MA 01748
Telephone: (508) 293-7450
Facsimile: (508) 293-7189